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July 20, 2005

Paul Dabbs, Chief
Water Resources Evaluation Section
Statewide Water Planning Branch
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Via Fax: 916-651-9289

Olivenhain Municipal Water District's Comments on the Public Review Draft California Water Plan Update 2005

Dear Mr. Dabbs:

The Olivenhain Municipal Water District (OMWD), in conjunction with the Association of California Water Agencies (ACWA) appreciates the opportunity to provide comments on the Public Review Draft of the California Water Plan Update 2005 (Update 2005).

OMWD serves over 52,000 customers in the North Central part of San Diego County. OMWD works interdependently with ACWA and other agencies within the State to provide Californians with the safe, reliable, and affordable water necessary to sustain our communities, and ensure a strong economy and a healthy environment.

The Update reflects the interests and perspectives of many stakeholders, DWR staff, and others as well. We recognize that Update 2005 is a product of the unique process that was used in its development and we offer our comments to add to the process.

We provide the following comments on Update 2005:

1. OMWD agrees with ACWA and strongly endorses the DWR's new emphasis in Update 2005 on identifying regional water issues and promoting integrated regional water management. ACWA members, and the water community as a whole, have been taking steps to lead in the management of water resources for at least two decades and are now seeking to encourage the state and federal governments to recommit and re-engage in water issues. Most of the significant water management and development projects that have been implemented during this time have been local or subregional in nature, although many regional cooperative models are also contributing to California's water security and reliability. We believe that DWR must continue to pursue more detailed and dynamic integrated regional water management plans in order to better leverage and coordinate future local efforts that would benefit from such partnership.

2. OMWD is concerned that the Bulletin 160 process to identify the state's future water needs is not clearly met in Update 2005. We understand that DWR and its Public Advisory Committee determined that water supply and use data are insufficient to do a comprehensive quantitative analysis to estimate water needs under various scenarios. But we feel that the lack of some form of the so-called "gap analysis" hampers the usefulness of Update 2005. We are particularly concerned that Update 2005 falls short of stating the magnitude of the State's dire water supply and reliability situation probable in the next and subsequent multi-year drought conditions.
3. OMWD is concerned that Update 2005 does not contain a strong enough statement of commitment to the rebuilding and enhancing of the state's backbone water system infrastructure, as called for in ACWA's Blueprint. We believe that Update 2005 must clearly call for state development of new surface and groundwater storage now for statewide benefit; and we also believe Update 2005 must clearly commit the state to actively facilitating regional and local projects to enhance water reliability statewide.
4. OMWD believes that Update 2005 must more clearly emphasize a proactive state response to seemingly significant emerging threats to our water supply and system: climate change, groundwater pollution, and xenobiotic contaminants, to name a few of the emerging issues that need to be further addressed.
5. Although Update 2005 identifies the need for increased water conservation and reuse in all sectors, as among the many water resource management strategies, we believe it is only one component of a multi-pronged approach. Aggressive water conservation and reuse and investment in new or re-developed water supply and management projects are two of the choices for most local water agencies. Cost effective local efforts to further conserve and reuse water must continue to be implemented, *while* new water supplies, such as desalination, must be developed to ensure a secure water future for our growing and dynamic state. Update 2005 needs to be revised to clearly clarify the premise that water conservation and reuse alone will **NOT** meet California's future increased water needs.
6. We also believe that Update 2005 does not focus enough specific attention to facing the dilemma of the Sacramento-San Joaquin Delta and our water system:
 - a. There is not enough emphasis on the reality that the Delta is the essential, yet highly vulnerable crux of the state's internal backbone water system;
 - b. There is not enough recognition that the Delta's physical processes (oxidizing soils, decreasing levee stability, significant earthquake threat, and increasing sea level), and its ecological processes (fish population indicators, invasive species impacts) demand a focused, immediate, and unprecedented response to correct and upgrade them.
7. OMWD encourages DWR to revise Update 2005 to embrace ACWA's call for a high-level, gubernatorial appointed commission to examine and develop an immediate and comprehensive response to the Bay-Delta situation.
8. OMWD recommends that more emphasis be placed on development of alternative water supplies such as seawater desalination and groundwater aquifer clean up and recharge. Combined with efforts to improve electrical supply sources and reduced costs throughout the state, we believe that technology must be researched and developed to allow for cost effective potable water desalination within the next decade.

OMWD requests DWR to consider and address all of the concerns expressed above, which we believe will help improve Update 2005.

We look forward to continuing to work cooperatively with DWR and other agencies on future plans and the California and Water Plan updates. We also look forward to working with DWR, ACWA and other stakeholders to implement the state water plan and Update 2005.

Sincerely

A handwritten signature in black ink, appearing to read "David G. McCollom". The signature is fluid and cursive, with the first name "David" being more legible than the last name "McCollom".

David G. McCollom
General Manager

cc: ACWA

Gary Arant - Valley Center MWD

Via Fax: 760-749-6478